June 7, 2000

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CRANBERRY MARKETING ORDER [DOCKET NO. FV00-929-2PR]

I agree with the Cranberry Marketing Committee's recommendation that the grower's sales history on established acres be based on the average of four of the last six years history and the Allotment Percentage be 85%.

I do not agree with the way New Acres are being handled, especially those harvested the first time in 1999. These acres were planted back when Ocean Spray was encouraging new plantings, saying they needed more berries. When they were planted, there was no indication of a surplus coming on.

Acres that were harvested for the first time in 1999 and produced more than 50 barrels/acre are being unfairly treated. Acres never harvested and those harvested the first time in 1999 and produced less than 50 barrels/acre will be given a base quantity of the state average. (Oregon state average is 164) Acreage harvested for the first time and produced more than the 50 barrels/acre will get a base quantity of what they produced. Why should acreage that produced 49 barrels/acre for the first time in 1999 get the state average of 164, while acres that were harvested the first time in 1999 and produced 51 barrels/acre get 51.

The Cranberry Marketing Committee admits this is the most unfair part of the Marketing Order and yet it is not being addressed.

To be fair, all acreage harvested the first time in 1999 should be treated the same, they should all be given the state average. There should not be acreage that has never harvested and acreage harvested the first time in 1999, being given a higher base quantity than other acres that produced more that first year in 1999.

I agree that there should be a Marketing Order implemented to help with the oversupply, so I urge the USDA to address this part of the Order, and make it is fair as possible to everyone.

Sincerely,

Dan Loshbaugh